

The motion is DENIED WITHOUT PREJUDICE to refiling
in compliance with Local Rule 7.01(a)(1).

Alistair E. Newbern

Alistair E. Newbern
U.S. Magistrate Judge

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

)
)
JANE DOE,) Case No.: 3:25-cv-00249
)
Plaintiff,)
) Judge: Waverly D. Crenshaw, Jr.
v.)
JOHN ROE; XYZ, LLC,)
)
Defendants.)
)

PLAINTIFF'S MOTION TO PROCEED UNDER PSEUDONYM

Plaintiff Jane Doe respectfully moves this Court for leave to proceed under a pseudonym in the above-captioned matter. Doe files this motion pursuant to Rule 10(a) of the Federal Rules of Civil Procedure, relevant precedent in the Sixth Circuit, and the Court's inherent authority to protect litigants' privacy interests. In support of this Motion, Doe states as follows:

1. This lawsuit arises from Defendants' nonconsensual distribution of highly personal, intimate images and videos pertaining to Doe, including content that is both nude and explicit in nature.

2. Public disclosure of Doe's real name would severely compromise her privacy, subject her to heightened risk of retaliation, and cause irreparable harm to her reputation, particularly given that she performs at family-friendly venues and events.

3. Defendants already know Doe's true identity and therefore suffer no prejudice if she proceeds anonymously for the public docket.

4. Courts in this District regularly grant pseudonymity under similar circumstances, particularly where the plaintiff alleges violations involving nonconsensual intimate images.

5. Mutual pseudonymity is necessary to protect Doe's identity; requiring disclosure of Defendants' names would functionally disclose Doe's identity as well.

6. In accordance with Local Rules and the Federal Rules of Civil Procedure, Doe stands ready to file her identifying information under seal if the Court so requires.

WHEREFORE, for the reasons stated herein and in the accompanying Memorandum of Law, Plaintiff respectfully requests that the Court grant leave to proceed under a pseudonym and enter any additional protective orders necessary to maintain the confidentiality of Doe's identity.

A Proposed Order is attached for the Court's convenience.

Dated: March 4, 2025

Respectfully submitted,

/s/ *Chanelle Acheson*
Chanelle Acheson
Waddey Acheson LLC
1030 16th Ave. South, Suite 300
Nashville, TN 37212
(615) 839-1100